

IN THE UNITED STATES DISTRICT COURT
FOR THE DISTRICT OF DELAWARE

PLAINTIFF, Leonard K Baylis)
v. Stan Taylor et al) CIVIL ACTION NO. 06-11-SLR
DEFENDANT)

JAN 17 2006

MOTION FOR APPOINTMENT OF COUNSEL

COMES NOW, THE Plaintiff, Leonard Baylis, Pro-Se and moves this Honorable Court for Appointment of Counsel, to represent Plaintiff.

In support of this Motion Plaintiff states that the following is true and correct, to the best of his knowledge and belief:

1. Plaintiff is incarcerated.
2. Plaintiff is unskilled in the law.
3. The administration at the Delaware Correctional Center where the Plaintiff is held limits the days and times that Plaintiff is allowed access to the law library.
4. Knowing that there will be testimony from witnesses, and expert testimony, which will put the Pro-Se Litigant at a considerable disadvantage.
5. Appointment of Counsel would serve "the best interests of justice" in this case.

6. Please See Attached

WHEREFORE, Plaintiff prays this Honorable Court appoint counsel to represent the Plaintiff.

DATE: 11 JANUARY 06

Leonard K Baylis

Delaware Correctional Center
Smyrna, DE 19977

Re: 06-11-SLR

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For these additional reasons, I Leonard Baylis, Respectfully Request Appointment of Counsel:

Because of my mental health problems I have trouble expressing what I believe needs to be expressed. I get frustrated and mixed up. I forget important issues because of distractions and emotions. Sometimes I lose my temper, my hands and arms swing out of control and I defeat myself.

An attorney is needed to gain access to witnesses and correctional medical systems (C.M.S.) records that show actual treatment accomplished vs. what is inflated, changed or covered up in this case; that shows C.M.S. and the Department of Corrections in a favorable light, regardless of reality;

To properly apply this case in the light of present medical and mental health mandates as established in *Tilley vs. Owens*, 719 F.Supp 1256 (upheld, 3rd Circuit; 907 F.2d 418)

An Attorney is needed to make provisions for an unbiased, independent examination to be accomplished outside the auspices of Correctional Medical Systems and The Dept. of Corrections — This done on an emergency basis, with relevant treatment, medication and housing as recommended. Mervin has a rare combination of disorders — outside the present "abilities" of Correctional Medical Systems and The Department of Corrections — and must be treated synergistically. Failing this, Mervin's condition can only be compounded, and punishment carried further than is humane.

Re: 06-11-SLR

II

An Attorney is needed to MAKE provisions For An unbiased, independent examination, to be Accomplished outside the AUSPICES OF Correctional Medical Systems And The Department of Corrections. — This done on AN emergency basis, with Relevant treatment, Medication, And Housing AS Recommended. MCVANT HAS A RARE Combination of disorders — outside the present "Abilities" of Correctional Medical Systems and the Department of Corrections — And must be treated Synergistically. Failing this, MCVANT'S Condition CAN only be Compounded, And, punishment Carried Further than is humane.

Respectfully Submitted, 11 Jan 06

Leonard Baylis
LEONARD Baylis

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SBI# 100431 UNIT V
DELAWARE CORRECTIONAL CENTER
1181 PADDOCK ROAD
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Legal
Indigent

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